REMARKS

Reconsideration and allowance of this subject application are respectfully requested.

Applicants request acknowledgement of the claim for domestic priority made under 35 U.S.C. §120. Applicants note with appreciation the Examiner's allowance of the foreign priority claimed under 35 U.S.C. §119. A certified copy of the Finnish priority document will be provided in the next several weeks to perfect this foreign priority claim.

Claims 1-20 stand rejected under 35 U.S.C. §103 as being patentable over U.S. 5,890,171 to Blumer et al. This rejection is respectfully traversed.

There are several known techniques for storing a large number of documents in a database. A single document in the database may contain references to other documents, graphics files, and/or sound files of the same database or even to a separate database. An example of such a document is an HTML document widely used in the Internet/World Wide Web (WWW) environment. Typically, a database of HTML documents is stored on a web server connected to the World Wide Web. A user can browse documents stored in the database at the web server using a web browser. Typically, the web server receives a uniform resource locator (URL) request from the web browser, decodes URL, handles the document files, and sends the requested files to the web browser. It is also possible to browse documents locally in a local file system in a stand-alone data processing device that is not connected to the World Wide Web. In this case, the document address

BROK et al. Appl. No. 09/450,941 January 16, 2004

corresponding to a local file path is given to the local file system which then retrieves the file for the browser.

These conventional arrangements are problematic in a situation where a document database has been configured so that a set of multiple documents is stored as a <u>single file</u>. Typically, the browser can only access separate documents located at a given URL address. But in a single file database structure, those documents stored in the single file can not be accessed in this traditional fashion.

Nevertheless, there is a significant advantage to structuring a database that includes thousands of individual documents by storing them as a single file. A single file can be managed much more easily than thousands of separate files, some of which may be of different file types. Moreover, the single file is more readily assigned a product identity and a version identifier, facilitating guarantee of the quality of the information contained in the database through proper version handling.

Each of the multiple documents in a single file database typically contains links to other documents in that database. This creates a problem if it is desired to make the database transferable to different locations. In other words, the document links must be defined and handled so that a location-independent database can be achieved. Moreover, it would advantageous if the single file database could be defined so that the same database management could be used in a network context (the database could be copied to any network server), and a local file system in a stand-alone data processor (the database could be copied to any file path in the file system).

BROK et al. Appl. No. 09/450,941 January 16, 2004

The present invention solves these problems and achieves these desirable objectives by storing the multiple documents in a single file database using a specialized protocol. A non-limiting example of this single file database protocol is set forth in the detailed description starting on page 11 and is referred to as 'edw'. But the browser does not understand a specialized, single file database syntax. Accordingly, the references in the documents (e.g., URL's) must be transformed before a document in the database can be provided to the browser for display. This is true for a network server application and for a stand-alone data processor application.

Blumer does not even acknowledge the existence or the possibility of using a single file database to store multiple documents, where at least one document contains references or links to others of those documents. There is certainly no recognition in Blumer of the problems of using such a single file database when documents are retrieved by web browsers. Blumer is simply related to a method for interpreting hypertext links in a document when that document is included in another document.

Regarding claim 1, the Examiner refers to the Blumer text in column 5, lines 55-67, which simply describes a web browser, as well as to the Blumer text at column 6, lines 25-35, which simply describes a document server. The Examiner completely ignores the language of claim 1 which states "browsing a database consisting of a set of documents stored electronically as a single file." This quoted language is neither disclosed or suggested in Blumer. The remaining steps of claim 1, including the retrieving, scanning, transforming, and transmitting steps are in the context of retrieving a

BROK et al. Appl. No. 09/450,941 January 16, 2004

document from this single file database that includes a set of documents that are intentionally stored as a single file.

This error in the Examiner's analysis of claim 1 is further demonstrated in the rejection of claim 2. Claim 2 recites "said <u>single file</u> comprises an <u>index</u> of the location of said documents within the file." Nowhere does the Examiner demonstrate where Blumer teaches a single file or where such a file includes an index of locations of the documents within that file. Nor does the Examiner point out where Blumer teaches that the claimed step of retrieving "comprises determining the position of the requested document in the file <u>using the index</u>."

Claim 3 also recites a method for "browsing a database including a set of documents stored electronically as a single file." There is no teaching of a single file database in Blumer. Although the Examiner indicates that Blumer teaches translation, in the sense that Blumer teaches generally translating a database response into an HTML page, this is not the same as "dynamically transforming the references of said retrieved document from a special, single file database syntax to a form said browser is capable of understanding." There is no teaching of a document being retrieved from a database that employs a "special, single file database syntax."

Regarding claim 4, the Examiner ignores the fact that this method relates to a "browsing documents stored in at least two databases connected to each other by communication means," where "at least one of said documents including references to other documents and/or files in one or both of the databases." Nor is there a teaching or

BROK et al. Appl. No. 09/450,941

January 16, 2004

suggestion in Blumer of "dynamically transforming the references of said retrieved

document from a special syntax associated with a set of documents, including the at least

one document, being stored as a single file in at least one of the databases to a form said

browser is capable of understanding."

Independent claims 12 and 20 are patentable over Blumer at least for the same

reasons articulated above with respect to claim 3. Claim 13 is patentable for at least for

the same reasons articulated with respect to claim 4.

Since Blumer fails to identify (1) even the possibility of using a single file

database to store multiple documents or (2) the problems associated with retrieving a

document that includes links to other documents in that database from such a single file

database, Applicants respectfully submit that there is no motivation whatsoever to modify

Blumer to make it more like the present invention. Accordingly, the rejection should be

withdrawn. Applicants respectfully submit that the present application is now in

condition for allowance.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By:

John R. Lastova

Reg. No. 33,149

JRL:at

1100 North Glebe Road, 8th Floor

Arlington, VA 22201-4714

Telephone: (703) 816-4000

Facsimile: (703) 816-4100

- 13 -